

# **Issues for Public Comment**

## **111(d) Plan Development**

The North Dakota Department (Department) is soliciting comments on the following issues as well as any other issues that are pertinent to the plan development:

### **General Questions:**

- 1) Should the Department develop a plan? If yes, should it be a “State only” plan or a regional plan?
- 2) To what extent should the Department develop a plan?
  - Only improvements at the power plant (inside the fence line)
  - Complete plan as outlined by EPA
  - Something in-between
- 3) Should the plan be based on:
  - Mass emission limits (mass) - How should allowances be allocated?
  - Emission rate limits (rate) - Uniform rate or uniform percentage reduction?
  - Block 1 - Plant efficiency improvements only?
  - State measures (e.g. plant limits plus demand-side energy efficiency programs)?
- 4) How should the Department incorporate cost and electrical grid reliability concerns into the plan?
- 5) Should the Department propose any legislation necessary for implementing the plan?
- 6) Suggestions for cost-effective carbon dioxide reductions.
- 7) Comments on EPA’s three building blocks and how they apply to North Dakota sources.
- 8) Comments on coordination with the North Dakota Public Service Commission.
- 9) Comments on coordination with other states.

### **Block 1 Questions (Block 1 of EPA’s Clean Power Plan refers to efficiency improvements at the existing power plants):**

- 10) How should the Department consider “remaining useful life” of each plant in the plan?

### **Block 3 Questions (Block 3 refers to renewable generation replacing existing coal-fired generation):**

- 11) How should the Department incorporate accounting of renewable generation emission rate credits or excess mass allowances into the plan?
  - North Dakota takes credit for all renewable generation in the state
  - North Dakota takes credit for a certain percentage of renewable generation
  - Owners of the renewable power can decide how to use the credits as they see fit
- 12) Should the Department allow trading of emission rate credits (ERC) or mass allowances (tons of CO<sub>2</sub> emissions)?
  - No trading at all
  - In-state trading only
  - Region wide trading
  - Nationwide trading